

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
MANHATTAN, NEW YORK

Harry Kerames

*

Plaintiff, pro se

*

v.

*

Civil Action No.

Wells Fargo

* * * * *

COMPLAINT

NATURE OF ACTION

1. This is an action alleging that the Defendant, Wells Fargo Bank NA “Wells Fargo”, is making false and fraudulent claims in regard to mortgage from 2003 to World Saving Bank FSB, “World Savings”.

2. Unbeknowst to the Plaintiff at the time, the mortgage was a pick a payment loan.

3. Subsequently, Wachovia Mortgage, FSB, "Wachovia", took over World Savings, and subsequently Wells Fargo Bank N.A, "Wells Fargo", took over Wachovia.

4. In 2010, a class action against Wells Fargo was settled and Wells Fargo agreed to a stipulation in regard to World Savings that it would only be able to collect interest on the mortgages, not the principal and had to make loan modifications.

5. Starting in 2016, Wells Fargo claimed \$467,482.65, including the principal. Wells Fargo continues to this day to add interest on that amount.

6. The Plaintiff herein with compounded interest has been deprived of in excess of \$1,000,000 and loss of reputation.

PARTIES

18. The Plaintiff, Harry Kerames, is resident of 61-65 Filonos Str, 185 35 Piraeus, Greece, and is also a citizen of Greece.

19. The Defendant Wells Fargo Bank NA is represented by its CEO, Charles W. Scharf. The address of Wells Fargo is 420 Montgomery Street San Francisco, CA 94104.

20. The property mortgaged is 6 Laurel Road, Westport, Connecticut 06880.

STATEMENT OF FACTS/ FACTS

Incorporating 1 to 20 herein as 21 through 40.

CLAIM FOR RELIEF

COUNT ONE

41. The Plaintiff hereby incorporates by reference the preceding paragraphs as if they were fully set forth herein.

42. Count One: fraud.

43. Preventing Plaintiff from selling or refinancing the property.

44. "Good faith" means honesty in fact and the observance of reasonable commercial standards of the integrity of official records and business records.

45. As a direct and proximate result of the aforesaid actions, the Plaintiff may suffer a substantial loss of money and property.

Wherefore, the Plaintiff claims:

AS TO COUNT ONE:

1. Money damages daily until said record are expunged.;
2. Costs of litigation;
3. Consequential damages
4. Such equitable relief as may seem to the Court to be just and proper; and interest pursuant to statutory remedies, where such are affected

JURISDICTION

1. The Jurisdiction of the instant Court is proper since the Defendant, Wells Fargo have substantial interests and ties to the State of New York.

Dated October 11, 2022, /s/ Harry Kerames.

Respectfully,

for the Plaintiff, Harry Kerames, pro se

By

/s/ Harry Kerames

Harry Kerames, acting pro se

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